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Attorney for Defendant  
JOSE MANUEL ONTIVEROS VERDUGO

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,	)	Case No: 2:23-CR-0162-DAD
Plaintiff,	)	
	)	
vs.	)	STIPULATION AND ORDER TO CONTINUE
	)	STATUS CONFERENCE AND EXCLUDE
JORGE OMAR ARREDONDO-GARCIA, et	)	TIME
al.,	)	
Defendant.	)	District Judge Dale A. Drozd
	)	New Date: June 11, 2024
	)	Time: 9:30 a.m.
	)	

IT IS HEREBY STIPULATED and requested by and between the parties through their respective counsel, ADRIAN KINSELLA, Assistant United States Attorney, attorney for the GOVERNMENT; PATRICK MCCARTHY, attorney for Defendant JORGE OMAR ARREDONDO-GARCIA; DINA SANTOS, attorney for Defendant GREGORIO ONTIVEROS VERDUGO; RACHELLE BARBOUR, attorney for Defendant JOSE MANUEL ONTIVEROS VERDUGO; MARK REICHEL, attorney for Defendant ALBERTO NAVARRO ZAPATA; and MICHAEL LONG, attorney for Defendant WILFREDO F. REYES, that the status conference currently set for Tuesday, March 26, 2024, be continued to Tuesday, June 11, 2024 at 9:30 a.m., and that time be excluded for preparation of counsel.

There is a protective order in this multi-defendant case. (Doc. 69.) The Government first produced discovery consisting of approximately 700 pages of Bates-stamped documents and over 73.9 gigabytes of native files, including cell phone databases and other items for defense

1 review. The Government then produced over 1400 pages of additional protected discovery. A  
2 third production of approximately 2000 pages of protected discovery was just received last week.

3 Since the start of the case, Defense counsel have been reviewing and analyzing the above,  
4 conducting legal research, meeting with their clients, and otherwise preparing for trial. The  
5 above tasks are ongoing, and the defense requires additional time to review discovery, discuss  
6 the case with their clients and the Government, and continue to prepare. The parties believe that  
7 failure to grant the requested continuance would deny defense counsel the reasonable time  
8 necessary for effective preparation, taking into account the exercise of due diligence.

9 Accordingly, the parties stipulate and request that the Court exclude time between the  
10 date of the filing of this stipulation through the new status conference date of June 11, 2024  
11 under 18 U.S.C. § 3161(h)(7)(A), (B)(iv) (Local Code T4). The parties agree that the ends of  
12 justice served by continuing the case as requested outweigh the interest of the public and the  
13 defendant in a trial within the original date prescribed by the Speedy Trial Act.

14 Date: March 20, 2024

15 /s/ Patrick McCarthy  
16 PATRICK McCARTHY  
17 Attorney for Defendant  
JORGE OMAR ARREDONDO-GARCIA

18 /s/ Dina Santos  
19 DINA SANTOS  
20 Attorneys for Defendant  
GREGORIO ONTIVEROS VERDUGO

21 HEATHER E. WILLIAMS  
22 Federal Defender

23 /s/ Rachelle Barbour  
24 RACHELLE BARBOUR  
25 Attorney for Defendant  
JOSE MANUEL ONTIVEROS VERDUGO

26 /s/ Mark Reichel  
27 MARK REICHEL  
28 Attorney for Defendant  
ALBERTO NAVARRO ZAPATA

/s/ Michael Long  
MICHAEL LONG  
Attorney for Defendant  
WILFREDO F. REYES

DATED: March 20, 2024

PHILLIP A. TALBERT  
United States Attorney

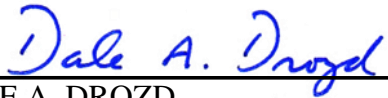
/s/ Adrian Kinsella  
ADRIAN KINSELLA  
Assistant U.S. Attorney  
Attorney for the United States

O R D E R

Pursuant to the stipulation of the parties and good cause appearing, the status conference currently set for Tuesday, March 26, 2024, is continued to Tuesday, June 11, 2024 at 9:30 a.m., and time is excluded under Local Code T4 for preparation of counsel.

IT IS SO ORDERED.

Dated: March 20, 2024

  
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DALE A. DROZD  
UNITED STATES DISTRICT JUDGE